

From: Mia, Marcia

Sent: Wednesday, July 17, 2019 02:24 PM

To: Ostrand, Laurie

Subject: RE: Subpart 0000a questions

I agree that is is not there. Oversight, looks like KKK didn't have it either. You could use 60.19 to establish the timeline - it sort of loosely fits. If they are okay with 30 days that seems reasonable.

Marcia B Mia

Air Branch

Office of Compliance

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U.S. Environmental Protection Agency

202-564-7042

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From: Ostrand, Laurie

Sent: Wednesday, July 17, 2019 10:02 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Cc: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Subject: FW: Subpart 0000a questions

Hi Marcia

Thought I'd check with you before responding to this question:

Do you know where it's required that LDAR semiannual reports need to be submitted w/in 30 days after the end of the reporting period? Karen and I can't seem to find a specific requirement in the regs?

Unless you have some thoughts, I thought I'd respond that the semiannual reports are typically submitted within 30 days after the end of the semiannual period.

Laurie Ostrand

U.S. Environmental Protection Agency

8ENF-AT

1595 Wynkoop Street

Denver, Colorado 80202

303-312-6437

From: Marsh, Karen

Sent: Wednesday, July 17, 2019 7:13 AM

To: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Subject: RE: Subpart OOOOa questions

I don't see it either. I would think there's some timeframe to prepare the report. If their initial semiannual report has to include the first 180 days, then they would need time to pull the information and get the report in. It may not be in our rules, but maybe it's how states handle it? I think most gas plants report based on how their permit states the deadlines.

For annual reports in OOOOa they have to submit the initial annual report within 90 days after the end of that initial compliance period. It doesn't look like we stated anything similar for semiannual reports for gas plants. I checked VVa as well and didn't see anything.

VVa states they have to submit semiannual reports beginning 6 months after the initial startup date. 60.487a(a).

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Ostrand, Laurie

Sent: Tuesday, July 16, 2019 2:20 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: RE: Subpart 0000a questions

Thanks Karen

Do you know where it's required that semiannual reports need to be submitted w/in 30 days after the end of the reporting period? I'm not finding it in the regs?

Laurie Ostrand

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From: Marsh, Karen

Sent: Tuesday, July 16, 2019 11:21 AM

To: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Subject: RE: Subpart 0000a questions

Ex. 5 Deliberative Process (DP)

Karen R. Marsh, PE

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Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Ostrand, Laurie

Sent: Tuesday, July 16, 2019 1:14 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: RE: Subpart OOOOa questions

I think it's because the NDE leak rate is 500 ppm and the normal to monitor leak rate is 500 ppm. I'm assuming he thinks that we historically excluded the NDE components because we didn't think the cameras could see the 500 ppm leak level.

Laurie Ostrand

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Denver, Colorado 80202

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From: Marsh, Karen

Sent: Tuesday, July 16, 2019 11:12 AM

To: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Subject: RE: Subpart OOOOa questions

To answer his AWP question...

The gas plant can opt into using the AWP (annual M21 with monthly/bimonthly OGI). The entire gas plant is not designated as NDE, leakless, or a CVS. Therefore, for all components that are "normal to monitor", they can use OGI with the annual M21. Because there is an annual M21 requirement and NDE, leakless, and CVS components are only monitored annually, they would just monitor these components during that annual M21 inspection anyway.

I'm really confused why he thinks he can't adopt the AWP.

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

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Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Ostrand, Laurie

Sent: Tuesday, July 16, 2019 12:50 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Subject: FW: Subpart OOOOa questions

Hi Karen

With respect to the follow-up OGI question below, my understanding with using the AWP for OOOO/OOOOa natural gas processing plants is that even though the valve/pump leak rate of 500 ppm is the same as the NDE rate, companies can still use OGI for any equipment except closed vent systems, equipment designated as leakless, and equipment identified in the applicable subpart as having no detectable emissions. Is that correct?

Thanks

Laurie Ostrand

U.S. Environmental Protection Agency

8ENF-AT

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From: Chad Powell <cpowell@ltenv.com>

Sent: Tuesday, July 16, 2019 10:21 AM

To: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Cc: Beeler, Cindy <Beeler.Cindy@epa.gov>; North, Alexis <North.Alexis@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>

Subject: RE: Subpart OOOOa questions

Thanks, Laurie. I appreciate everyone coordinating these efforts.

Regarding the semiannual report, what is the due date? In this specific example, we have a gas processing plant that started operations on April 1st, 2019. Six months would put the end of the semiannual period at September 30th. When is the report due? October 30th? End of year? I can't find anything in the rule to indicate when the report must be submitted. Please clarify.

For the OGI question, it would appear that an onshore natural gas processing plant subject to Subpart OOOOa cannot use the current AWP since it must comply with the no detectable emissions standard. Therefore, an operator must use M21 only to conduct their inspections on a monthly basis. Correct?

Thanks,

Chad Powell

Senior Air Quality Scientist

303.962.5555 direct

720.284.8681 cell

From: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Sent: Tuesday, July 16, 2019 9:57 AM

To: Chad Powell <cpowell@ltenv.com>

Cc: Beeler, Cindy <Beeler.Cindy@epa.gov>; North, Alexis <North.Alexis@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>

Subject: FW: Subpart OOOOa questions

Hi Chad

Cindy requested that I respond to your OOOOa gas processing plant LDAR monitoring questions. See below.

OGI question:

The EPA has promulgated an alternative monitoring method, termed the alternative work practices (AWP), to Method 21 (M21). The current AWP is contained in 40 C.F.R. §§ 60.18(g), (h), and (i), 63.11(c), (d), and (e), and 65.7(e), (f), and (g). The EPA does not require facilities that opt into the current AWP to obtain EPA approval so long as you adopt the AWP as written in §§ 60.18(g), (h), and (i), 63.11(c), (d), and (e), or 65.7(e), (f), and (g).

Among other things, the current AWP requires: (1) OGI monitoring monthly, bimonthly, or semi quarterly - depending on the g/hr threshold that is selected; (2) replacing one of those OGI events with M21 monitoring each year; (3) keeping video records of the entire OGI survey; and (4) submitting the annual M21 records to ccg-awp@epa.gov. Also, the

current AWP excludes the use of the OGI for closed vent systems, equipment designated as leakless, and equipment identified in the applicable subpart as having no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background. The AWP, at §§ 60.18(h)(2), 63.11(d)(2), and 65.7(f)(2), requires that any leak identified using the OGI camera must be repaired. Since the OGI camera can detect methane, ethane, etc., for the purpose of the AWP the instrument used for the annual M21 monitoring, or to confirm that a leak was repaired, must also be able to detect the same compounds as the OGI camera.

Semiannual report question:

40 C.F.R. § 60.5422a, What are my additional reporting requirements for my affected facility subject to GHG and VOC requirements for onshore natural gas processing plants?, requires that initial and semiannual reports OOOOa reports be submitted to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI).

40 C.F.R. §60.487a, Reporting requirements, indicates:

Each owner or operator subject to the provisions of this subpart shall submit semiannual reports to the Administrator beginning 6 months after the initial startup date.

Also, 40 C.F.R. § 60.19, General notification and reporting requirements, indicates:

(d) If an owner or operator of an affected facility in a State with delegated authority is required to submit periodic reports under this part to the State, and if the State has an established timeline for the submission of periodic reports that is consistent with the reporting frequency(ies) specified for such facility under this part, the owner or operator may change the dates by which periodic reports under this part shall be submitted (without changing the frequency of reporting) to be consistent with the State's schedule by mutual agreement between the owner or operator and the State. The allowance in the previous sentence applies in each State beginning 1 year after the affected facility is required to be in compliance with the applicable subpart in this part. Procedures governing the implementation of this provision are specified in paragraph (f) of this section.

That being said, the majority of natural gas processing plant LDAR semiannual reports that I see are submitted in January (for the semiannual period from 7/1 to 12/31) and in July (for the semiannual period from 1/1 to 6/30).

Laurie Ostrand

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From: Chad Powell <cpowell@ltenv.com>

Sent: Monday, July 15, 2019 3:58 PM

To: Beeler, Cindy <Beeler.Cindy@epa.gov>
Cc: North, Alexis <North.Alexis@epa.gov>
Subject: RE: Subpart 0000a questions

Hi Cindy,

I hope you had a great weekend and have made progress on your deadlines. I have an additional question for you regarding Subpart 0000a. I'm going to add it to the list and when possible, can you answer all 3 questions? The additional question is:

Onshore natural gas processing plants subject to Subpart 0000a require Method 21 monitoring (cross-referenced with Subpart VVa). Are operators allowed to use Method 21 annually (i.e. once per year) and use OGI cameras to conduct their inspections the other 11 months as an alternative means of compliance with the regulation? Based on Section 60.18(g), I don't think this is allowed. But my interpretation may be off.

Thanks,

Chad Powell

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From: Beeler, Cindy <Beeler.Cindy@epa.gov>
Sent: Tuesday, July 09, 2019 1:43 PM
To: Chad Powell <cpowell@ltenv.com>
Cc: North, Alexis <North.Alexis@epa.gov>
Subject: RE: Subpart 0000a questions

Chad - I am in the middle of some pressing work with deadlines - I will look into your questions soon and get back to you.

Cindy Beeler

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recipient, please contact the sender and destroy all copies of this message.

From: Chad Powell <cpowell@ltenv.com>
Sent: Tuesday, July 9, 2019 1:19 PM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>
Cc: North, Alexis <North.Alexis@epa.gov>
Subject: Subpart 0000a questions

Hi Cindy,

Alexis asked that I reach out to you regarding a couple Subpart 0000a questions. Here we go:

I couldn't find a due date for Subpart 0000a semi-annual reports for onshore natural gas processing plants. While the regulation stipulates semi-annual reporting, I don't see whether the report is due within 30 days of the end of the period or some other timeframe. Can you please clarify this?

Under the upstream production segment, a 2-hour Method 22 test is required when initially evaluating the flare/combustor. Subsequent testing should be performed monthly but for 15 minutes (instead of 2-hours). However, Section 60.5412a(a)(3) requires that a flare be designed and operated to comply with Section 60.18(b). Section 60.18(f)(1) requires 2-hour Method 22s each time. Does this conflict? Does one part of the regulation take precedent over the other? Please clarify.

If you have any questions for me, please let me know.

Thanks,

cid:image002.png@01D4A347.0FF4E460

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